

FILED
WILKES BARRE
AUG 14 2018

Per MS

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: SEALED MATTER	No. <u>5:18MJ75</u>
AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT	

MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, moves pursuant to Rule 6 of the Federal Rules of Criminal Procedure to file the documents accompanying this motion under seal for the reasons set forth in the accompanying sealed declaration in support of the Government's motion to seal.

WHEREFORE, for the foregoing reasons, the United States moves to seal the attached documents. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,

/s/ Michelle Olshefski
Michelle Olshefski
Assistant U.S. Attorney

Date: August 13, 2018

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: SEALED MATTER AFFIDAVIT FOR CRIMINAL COMPLAINT	5:18 MJ 75

DECLARATION IN SUPPORT OF MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, Michelle Olshefski, and submits the following Declaration in Support of the Government's Motion to Seal, pursuant to Rule 6 of the Federal Rules of Criminal Procedure.

1. Your declarant states that, in the view of your declarant this Declaration and the following documents should be filed under seal:

- | | |
|---|--|
| <input type="checkbox"/> Indictment | <input type="checkbox"/> Complaint |
| <input type="checkbox"/> Material Witness | <input type="checkbox"/> Pen Register |
| <input type="checkbox"/> Plea Agreement | <input type="checkbox"/> Affidavit in Support of
Criminal Complaint |

2. The United States requests that the above-referenced documents, and this Motion, remain under seal pending:

- ☒ Further Order of Court; or
- ☐ Written notification by the United States that these pleadings no longer need to remain filed under seal; or
- ☐ _____

3. In support of this Motion, the United States alleges that filing these

pleadings under seal is necessary in order to:

- ☒ Preserve the integrity of this ongoing case;
- ☒ Ensure the safety of investigative personnel;
- ☒ Protect the identity of potential witnesses;
- ☒ Allow for the seizure of evidence;
- ☒ Permit the arrest of those charged with violations of criminal laws; or
- ☐ Allow this defendant to complete the cooperation aspects of the plea agreement.
- ☐ Avoid unfair prejudice to the defendants

WHEREFORE, for the foregoing reasons, the United States moves to seal this Declaration and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,

/s/ Michelle Olshefski
Michelle Olshefski
Assistant U.S. Attorney

Date: August 13, 2018